

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

NABEEL IQBAL	§	
	§	
<i>Plaintiff,</i>	§	
v.	§	CIVIL ACTION NO.: 4:19-cv-03608
	§	
	§	
THE CITY OF PASADENA and DANIEL PENNINGTON	§	
	§	
	§	JURY DEMANDED
<i>Defendants.</i>	§	
	§	
	§	

PLAINTIFF NABEEL IQBAL'S PROPOSED VOIR DIRE OF THE JURY

Plaintiff Nabeel Iqbal (“Plaintiff”), submits the following proposed voir dire examination as required by the Court’s procedures:

1. The Plaintiff in this case is Nabeel Iqbal. Do you or any member of your family know Mr. Iqbal? If so, in what manner, i.e., are you related to him, or do you know him either socially or through business?
2. Are you familiar with one of the Defendants in this case, the City of Pasadena, and their public library department? If so, how?
3. Are you familiar with the other Defendant in this case, Daniel Pennington? If so, how?
4. Have you, or has any close friend or family member, ever worked for the City of Pasadena? If so, please explain.
5. The Plaintiff is represented by Terrence B. Robinson and Zachary Sanders, and the Defendant, The City of Pasadena, is represented by William S. Helfand and Andrew W. Gray.

- a. Do any of you or your immediate family members know these attorneys? If so, in what manner, i.e., are you related to them, or do you know them socially or through business?
 - b. If you are related to or have had any social or business dealings with them, please state the nature of the relationship or dealings and whether that relationship or those dealings would prevent you from being a fair and impartial juror in this case.
6. Both William S. Helfand and Andrew W. Gray work for a law firm Lewis Brisbois Bisgaard & Smith, LLP.
- a. Have any of you or any member of your immediate family ever had any dealings with their law office or any of the individuals who work in that office?
 - b. If so, state the nature of those dealings and whether those dealings would prevent you from being a fair and impartial juror in this case.
7. Do you believe you have been a victim of discrimination in the workplace because of race, gender, religion, disability, or national origin? Do any close friends or family member believe he or she has experienced discrimination by an employer?
8. The Plaintiff in this case believes that the Defendant treated him differently because of his disability. What kinds of experiences have you had, or heard about from someone close to you, that lead you to believe some people may not be treated fairly on the job because of their disability?
9. Have you ever been accused of being discriminatory?
10. What is your general opinion of discrimination lawsuits (i.e., mostly frivolous, mostly meritorious, etc.)?
11. Do you think laws against discrimination are not tough enough, too tough, or just about right?

12. Do any of you believe that mental disability is different from physical disability? How so?
13. Do any of you supervise other employees or make personnel decisions about other employees? If so, please explain the nature of your job and the areas in which you supervise other employees.
14. Have you ever had a conflict with an employer concerning the employer's opinion of your conduct in the workplace? If so, please explain.
15. Is there any kind of conduct that you believe to be inexcusable in the workplace, regardless if it is due to a disability?
16. Have you ever been terminated or demoted due to your conduct in the workplace? If so, please explain.
17. Have you or any member of your family ever been discriminated against by an employer due to disability?
18. Have any of you ever filed charges of discrimination with the Equal Employment Opportunity Commission, the Texas Commission of Human Rights, the Civil Rights Division of the Texas Workforce Commission, the National Labor Relations Board, or any other governmental agency? If so, please explain.
19. Have any of you or any member of your immediate family ever been a plaintiff or a defendant in a case involving employment discrimination or unlawful retaliation? If so:
 - a. Please state whether you were a plaintiff or a defendant;
 - b. Please state the nature of the suit; and
 - c. Please state the name of the other party or parties who were involved in the lawsuit.

20. Have you, or has any close friend or family member ever suffered from a mental illness or undergone any kind of counseling, medical or psychiatric treatment to correct any mental health issues? If so:

- a. Please state that person's relationship to you
- b. Whether that person is currently employed

21. Do you have a strong opinion about people who suffer from anxiety disorders?

22. Do you have any strong opinions about how adults with anxiety disorders should manage their anxiety?

23. Do any of you have a strong opinion about people who suffer from Autism (a.k.a. Autism Spectrum Disorder)?

24. Do you have any strong opinions about how adults with Autism Spectrum Disorder should manage their symptoms of autism?

25. Have you or any immediate family member ever suffered from any disabilities that are or were known by an employer? If so, please explain.

26. Do you agree or disagree with this statement: Discrimination claims are just excuses to cover up other problems people are having on the job.

Respectfully submitted on this 22nd day of June 2021.



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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of June 2021, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system and served on all attorney(s) and/or parties of record via the CM/ECF service.



Terrence B. Robinson